

PORT KEMBLA COAL TERMINAL (PKCT) APPROVAL 08_0009

DEPARTMENT OF PLANNING AND ENVIRONMENT (DPE)- INDEPENDENT EXTERNAL AUDIT MARCH 2014

This audit was carried out in March 2014 after which an audit report (Version 2) was prepared by AEOM P/L and submitted to the DPE by PKCT on the 9th May 2014.

RESPONSE TO DPE REVIEW OF AUDIT SUBMISSION

By email of 29th May 2014, DPE provided a response to the audit submission raising a number of matters requiring PKCT's attention. PKCT sought to address these matters and by e mail of 10th June 2014, PKCT submitted a revised audit report (Version 3) together with a requested PKCT Action Plan.

DPE has provided further feedback by e mails on 16th June 2014. Clarification on some items was sought together with suggested changes to the AECOM Audit Report. A revised action plan and clarification of the requested points was to be submitted to the DPE by 23rd June 2014.

A further revision has been made to the AECOM Audit Report (version 4) and PKCT's Audit Action Plan has been revised herein. The table below outlines the DPE email comments, and PKCT's response.

Email Date and Time	DPE Comment	Response	Actioned By
RE: Port Kembla Coal Terminal_ Independent External Audit May 2014 - Review Comments. 16 th June 12:07pm.	"FYI there is a typographical error on page (i) of the Audit Report, 2 nd paragraph under <i>Compliance with the MCoA and EPL</i> . The first sentence indicated that PKCT complied with 38 of the applicable 47 EPL conditions. As there were only 4 non-compliances, this should read that PKCT complied with 43 of the applicable conditions. There is no need to resubmit the entire report – could you please just provide an electronic copy of the amended page".	Amended as recommended.	AECOM

<p>PKCT Response to Recommendations of the 2014 Environmental Audit Report. 16th June 1:55pm</p>	<p>The following recommendations on pages 28 and 29 of the Audit Report have not been addressed:</p> <p>Section 7.3.3 – the two recommendations regarding noise management.</p> <p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Update the Noise Management and Monitoring Plan to include discussion regarding the limitations posed by, and appropriateness of using the Barn Owl Noise Monitoring System. - Conduct further analysis of the measurement results to verify whether the limitations of the Barn Owl system do not adversely impact the findings of the report. 	<p>Recommendations have been added to the AECOM Audit Report- Audit Protocol against Noise: MCoA Schedule 3, condition 2. Audit finding for this item has been changed to an Opportunity for Improvement (OFI). OFI has been counted in Executive Summary and Section 4.0. Total OFIs against the MCoA now total 20.</p> <p>PKCT has included the recommendations in the Audit Action Plan herein (Item 28).</p>	<p>AECOM/PKCT</p>
<p>PKCT Response to Recommendations of the 2014 Environmental Audit Report. 16th June 1:55pm</p>	<p>The following recommendations on pages 28 and 29 of the Audit Report have not been addressed:</p> <p>Section 7.3.4 – recommendation that review of the DCC and Implementation Program should include:</p> <ul style="list-style-type: none"> - aligning the DCC obligations to the MCoA in particular to truck dispatch times from NRE to PKCT, - review of the Driver Summary sheet to ensure that all obligations within the DCC are included 	<p>Recommendations have been added to the AECOM Audit Report- Audit Protocol against Traffic: PKCT Driver Summary Sheet – Travel Time. Audit finding for this item has been changed to an OFI. OFI has been counted in Executive Summary and Section 4.0. Total OFIs against the MCoA now total 20.</p> <p>PKCT has included the recommendation in the Audit Action Plan herein (Items 15, 18 and 29).</p>	<p>AECOM/PKCT</p>
<p>PKCT Response to Recommendations of the 2014 Environmental Audit Report. 16th June 1:55pm</p>	<p>The following recommendations on pages 28 and 29 of the Audit Report have not been addressed:</p> <p>Section 7.3.4 – recommendation that review of the DCC and Implementation Program should include:</p> <ul style="list-style-type: none"> - the establishment and implementation of a monitoring/auditing schedule for undertaking CTO etc. 	<p>Recommendation has been added to the AECOM Audit Report-Audit Protocol against Traffic: MCoA Schedule 3, condition 6 (c). This was an existing opportunity for improvement – no need to change audit finding.</p> <p>PKCT has included the recommendation in the Audit Action Plan (Item 15) herein.</p>	<p>AECOM/PKCT</p>

<p>Department's Review Comments on Response to Recommendations and Action Plan PKCT 16 June 2014. 16th June 3:00pm</p>	<p>- Item 9 – the text under “Opportunity for Improvement” refers to the LMP. This should read GGEE Management Plan.</p>	<p>Audit Action Plan has been amended as recommended. LMP changed to GGEE</p>	<p>PKCT</p>
	<p>- Item 12 – the text under “PKCT Response” indicates that updating of the website to include details on the CCC would not be completed until 31 October 2014. It is questioned as to why it will take 4 months to complete this task?</p>	<p>Completion date was determined to allow for discussion at the next Community Consultative Committee meeting and a review of the current community content on the website. Item 12 has been revised to reflect.</p>	<p>PKCT</p>
	<p>- Item 13 – the text under “PKCT Response” indicates that PKCT is participating in a facilitated review of mine to port coal train operations. Can you please confirm that this review would specifically address the two items listed under “Opportunity for Improvement”.</p>	<p>The Action Plan has been updated to further clarify the actions of PKCT in relation to this recommendation.</p>	<p>PKCT</p>
	<p>- Item 15 - the text under “PKCT Response” indicates that the DCC Implementation Plan will be reviewed and revised as per Schedule 4, condition 7 i.e. within 3 months of submitting the Audit Report (8 August 2014). The text then advised that the annual review would occur on 27/11/15. It is questioned why the review would not occur in August 2015 as this would be the annual due date? The last line indicates a completion date of 8 August 2014. It is assumed that this relates to the first issue under this item?</p>	<p>Recommendation accepted.</p> <p>PKCT has updated the Action Plan to show an annual review date for the DCC Implementation Plan of 8th August 2015.</p> <p>The completion date of 8th August 2014 refers to the initial review of the DCC Implementation Plan.</p>	<p>PKCT</p>

	<ul style="list-style-type: none"> - Item 18 - the text under "PKCT Response" refers to the DCC Implementation Plan. However, the topic refers to the Driver Summary Sheet (which forms part of the DCC). The "Opportunity for Improvement" refers to the DCC. This section should indicate that update of the DCC, including the Driver Summary Sheet would be completed in accordance with Schedule 4, condition 7 i.e. by 8 August 2014. It is not clear as to why the Implementation Plan will not be reviewed until 8 March 2015 (e.g. is this the date when the next annual review is due) rather than 8 August 2014? 	<p>Recommendation accepted.</p> <p>The text in the Action Plan has been updated (Item 18) to refer to the DCC rather than the DCC Implementation Plan. The text in the Action Plan has also been updated to reference the review of the Driver Summary Sheet.</p> <p>The review dates for the DCC and the DCC Implementation Plan have been aligned to occur in the same month. The initial review for both documents will occur by 8th August 2014, and the annual review date for both documents will occur by 8th August 2015. These dates have been reflected in the Action Plan.</p>	PKCT
Department's Review Comments on Response to Recommendations and Action Plan PKCT 16 June 2014. 16 th June 3:00pm	In regards to the DCC and Implementation Plan, I refer you to the attached letter from the Department dated 25 September 2013 regarding the conditions surrounding increased road transportation from the terminal. These conditions include requirements relating to the DCC and would also influence the timing of future updates to the DCC and Implementation Plan.	The requirements outlined in the DPE's letter of 25 th September 2013 have been included as a subsection of the Action plan (Items 32 & 33)	PKCT
n/a	n/a	<p>During editing, it was identified that Item 30, EPL Schedule R1, Condition 5 had been omitted from the Action Plan. This recommendation was for PKCT to keep records of Annual Return Lodgements for quality assurance purposes.</p> <p>This Item has been added to the Action Plan and PKCT has responded accordingly (Item 30).</p>	PKCT

AECOM INDEPENDENT EXTERNAL AUDIT 2014: PKCT RESPONSE TO RECOMMENDATIONS AND ACTION PLAN JUNE 2014

Item No.	Approval	Condition/ Number	Topic/ Requirement	Audit Finding/ Comment	Recommendation	Response/Action
1	MCoA	Schedule 3, Condition 12	<p>Discharge Limits</p> <p>Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the Protection of the Environment Operations Act 1997.</p>	<p>Non-compliance (minor)</p> <p>Exceedances of pH and TSS criteria outlined in PKCT's EPL occurred over the reporting period, though they were minor and few.</p> <p>However, due to these exceedances PKCT does not comply with this condition.</p>	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Continue with undertaking controlled discharges after rain events. - Undertake sediment testing of sediment within the Settlement Lagoon to assess nutrient loading. Subject to test results, conduct maintenance of settlement lagoon to clear sediment. - Undertake further investigations into algae control options and trial. - If necessary and relevant, expand investigations regarding water quality controls and treatment beyond algal controls (e.g. study the receiving environment to determine potential environmental impacts of alkaline water entering this system). - If further control options are exhausted and prove ineffective 	<p>PKCT has been working with the EPA regarding measures and strategies to be implemented to reduce TSS and pH discharge exceedances at EPL Monitoring Point 16. In late 2013, two Pollution Reduction Programs (PRP), PRP 12 and PRP 13, were prepared in consultation with the EPA. These PRP's were approved and a licence variation was received on the 22nd November 2013.</p> <p>The intent of PRP12 is to improve stormwater controls at PKCT which will ultimately reduce sediment reporting to EPL discharge Point 16, and reduce the likelihood of future TSS exceedances. Work is currently underway on the PRP with a completion date of 30th June 2014.</p> <p>PRP13 was completed and a final report submitted to the EPA on 31st March 2014. The report identified a number of recommendations and further actions to reduce pH levels in site discharges. PKCT is awaiting a response from the EPA on the report and its recommendations.</p> <p>In the interim and noting the actions recommended in the Independent External Audit,</p>

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					<p>in lowering pH levels to within EPA-defined limits, engage in consultation with EPA regarding pH range and associated percentile compliance (noting permissible seasonal fluctuations if necessary).</p> <p>- Alternatively, engage in consultation with Sydney Water regarding potential water treatment options prior to distribution to PKCT.</p>	<p>PKCT has continued to undertake controlled discharges from the Settlement Lagoon after rain events.</p> <p>A specialist consultant has been engaged to review the available data and reports and to provide recommendations on methods to reduce pH levels in the discharge waters. Sediment testing has been undertaken in the Lagoon to assess the nutrient loading.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completed by: Specialist consultant report will be provided by the 8th August 2014. It is expected further actions will ensue from the recommendations and associated EPA consultation.</p>
2	EPL	Schedule L1 Condition 1	<p>Pollution of waters</p> <p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the</p>	<p>Non-compliance (minor)</p> <p>Refer to Item No.1 comment</p>	Refer to Item No.1 recommendations	Refer to Item No.1 response and actions

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			Environment Operations Act 1997.			
3	EPL	Schedule L2, Condition 1	Concentration Limits For each monitoring/dischARGE point or utilisation area specified in the table below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Non-compliance (minor) Refer to Item No.1 comment	Refer to Item No.1 recommendations	Refer to Item No.1 response and actions
4	EPL	Schedule L2, Condition 2	Concentration Limits Where a pH quality limits specified in the table, the specified	Non-compliance (minor) Refer to Item No.1 comment	Refer to Item No.1 recommendations	Refer to Item No.1 response and actions

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			percentage of samples must be within the specified ranges.			
5	EPL	Schedule M3, Condition 1	<p>Testing Methods, Concentration Limits</p> <p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>(a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant.</p>	<p>Non-compliance (minor)</p> <p>Monitoring method was confirmed to be appropriate. Only non-conformance noted was due to a Dust Deposition Gauge funnel at point P4 found not to be in the Dust Deposition Gauge bottle when observed during the audit. This was investigated and was thought to be due to tampering by the</p>	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Install a locked cage at this monitoring site to avoid future tampering, and undertake regular monitoring at this site to verify tampering has not occurred and the device is still functional. 	<p>Public access to this dust monitoring site is recognised as an issue. PKCT accepts the recommendation by AECOM and will investigate options, including those recommended, for improving security.</p> <p>Action by: PKCT Environmental Specialist</p> <p>Completion Date: A solution to the security issue at this monitoring site will be determined by the 8th August 2014 together with an implementation date.</p>

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				public. There has been anecdotal history of tampering and a locked cage has been recommended for this site.		

Item No.	Doc.	Condition	Topic	Opportunity for Improvement	PKCT Response/ Actions
6	MCoA	Schedule 3, Condition 13	Water Management Plan (WMP)	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Review and update the WMP at least annually so that the document reflects the current state of operations on site. - In particular, the WMP needs to include most recent EPL discharge criteria and exceedances, reference to new PRPs and investigations/trials undertaken to date. 	<p>In noting the non-compliance (minor) associated with pH and TSS, an initial WMP review will be undertaken within three months of the Independent Audit report submission date in accordance with Schedule 4, Condition 7.</p> <p>The document review will be tracked in PKCT's Event Management System (EMS) and is record "COR-00140".</p> <p>An annual review for this document has been entered into the EMS. The review is scheduled for 3rd March 2015 and is record "RR-00024".</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 8th August 2014</p>
7	MCoA	Schedule 3, Condition 14	Green and Golden Bell Frog Management Plan (GGBFMP)	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Review and update the GGBF Management Plan at least annually so that the document reflects the current state of operations on site. If no changes are made to the document, review date at least should be noted on the document to track reviews. 	<p>Findings and recommendations noted. PKCT accepts that a periodic review of Management Plans is necessary. However the reviews should be appropriate to the specific Plan and the frequency of change. The current review process for the GGBF is bi-annual. Internal and external events can trigger an earlier review under change management.</p> <p>The next document review is scheduled for 3rd October 2014. An action has also been entered in the EMS and is record "RR-00025"</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 30th November 2014.</p>

8	MCoA	Schedule 3, Condition 14	Landscape Management Plan (LMP)	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Review and update the LMP at least annually so that the document reflects the current state of operations on site, including ongoing maintenance of landscaping on site. 	<p>Findings and recommendations noted. PKCT accepts that a periodic review of Management Plans is necessary. However the reviews should be appropriate to the specific Plan and the frequency of change. The current review process for the LMP is bi-annual. Internal and external events can trigger an earlier review under change management.</p> <p>The next document review is scheduled for 29th August 2015. An action has also been entered in the EMS and is record "RR-00026".</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 30th September 2015</p>
9	MCoA	Schedule 3, Condition 18	Greenhouse and Energy Efficiency Plan (GGEE)	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Review and update the GGEE Management Plan at least annually so that the document reflects the current state of operation on site. - In particular, the GGEE needs to include reference to the most recent relevant legislation, NGERs data and a summary of information gathered through the ESAPs. 	<p>Findings and recommendations noted. PKCT accepts that a periodic review of Management Plans is necessary. However the reviews should be appropriate to the specific Plan and the frequency of change. The current review process for the GGEE is bi-annual. Internal and external events can trigger an earlier review under change management.</p> <p>The next review is scheduled for 31st July 2015. An action has also been entered in the EMS and is record "RR-00027".</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 31st August 2015.</p>
10	EPL	Operating Conditions, O4.1	Sedimentation Ponds	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Complete, finalise and implement Settlement Lagoon Cleanout Process document. Document/record implementation of document implementation (e.g. staff training and maintenance schedules). 	<p>Recommendation is accepted. An action has been entered in the EMS and the record is "COR-00138".</p> <p>Action by: PKCT Environmental Specialist.</p> <p>Completion Date: 25th September 2014.</p>

11	EPL	Pollution Studies and Reduction Programs U1.1	EIP - install northern truck wash upgrades	<p>It is recommended that PKCT ensure that the following part of the condition is completed by 30 June:</p> <p>By 30 June 2014 the licensee must carry out a review of the environmental performance of the Northern Truck Wash, and provide a written report describing the review to the EPA. This report must include information on how the issues identified in the PKCT Northern Truck Wash Review as per requirements in EPL 1625 PRP NO.10 Port Kembla Coal Terminal July 2011' and the EPA letter to the licensee dated 16 August 2011 have been addressed. In particular the review must include, but not be limited to, how the following key elements have been addressed:</p> <ul style="list-style-type: none"> - water treatment - spray pressure - spray volume - spray orientation - spray drift - vehicle speed - truckwash management - truckwash maintenance - truck wash auditing, and - water/dust carryover 	<p>Draft report is complete. PKCT has met with the EPA and submitted a request for an extension to the 30.9.14. The upgrade is practically complete but some further modifications impacting on truck performance still need to be carried out.</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 30th June 2014 subject to an extension to 30th September 2014.</p>
12	MCoA	Statement of Commitments	Community Relations	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Include details of CCC on PKCT website. 	<p>Recommendation is noted. An action has been entered in the EMS and the record is "COR-00139". Community information on the website will be reviewed and changes discussed with the Community Consultative Committee.</p>

					<p>Action by: PKCT Environmental Specialist.</p> <p>Completion Date: 31st October 2014</p>
13	EPL	Operating Conditions, O3.1	Dust	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Conduct an internal review relating to dust emissions beyond the boundary of the site. - Review the train receipt system to ensure all reasonable and feasible measures are employed to prevent or minimise dust impacts beyond the rail loop. 	<p>Findings and recommendations are noted. Considerable effort is required for these undertakings and this is reflected in the completion date below.</p> <p>An internal review will be undertaken by PKCT relating to dust emissions beyond the boundary of the site.</p> <p>PKCT is participating in a NSW Minerals Council facilitated review of mine to port coal train operations in Newcastle and the Illawarra. The study's focus is on fugitive emissions from coal trains and includes an industry survey which will audit existing practices and identify potential improvements.</p> <p>Action by: PKCT Risk Manager.</p> <p>Completion Date: 30th June 2015</p>
14	EPL	Operating Conditions, O3.2	Dust	As above	As above
15	MCoA	Schedule 3, Condition 6	Implementation Program for the Driver's Code of Conduct	<p>It is recommended that PKCT:</p> <ul style="list-style-type: none"> - Review and update the Implementation Program for the DCC at least annually, so that the document reflects the current state of operations on site. - Update the Implementation Program for the DCC to strengthen and specify PKCT's disciplinary process in instances of non-compliances. - Establish and implement a monitoring/auditing schedule for undertaking 	<p>Recommendation is accepted. In accordance with Schedule 4, Condition 7, the Implementation Plan for DCC will be reviewed and revised as appropriate.</p> <p>An action has been entered in the EMS and the record is "RR-0031". An annual review for DCC Implementation Plan has been entered into the EMS and the record is RR-00028.</p> <p>A monitoring schedule will be established and implemented as part of the review.</p>

				CTO's and intensive periods of monitoring of driver behaviour, within and external to the PKCT site, and document this monitoring program in the Implementation Program for DCC	Action By: PKCT Environment Specialist Completion Date: 8 th August 2014
16	DCC	Driver Summary Sheet	Road Delivery Standards – Hold a valid driver's licence	It is recommended that PKCT: - Include in monthly reporting template an opportunity for road transport providers to confirm that all drivers hold valid licences for the reporting period.	Recommendation is accepted. Action is complete. Monthly Reporting Template has been updated and distributed to relevant road transport providers via email on 3 rd June 2014.
17	DCC	Driver Summary Sheet	Road Delivery Standards - Not apply compression brakes at Port Kembla and Springhill Road	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is being progressed individually with relevant road transport providers. Action by: PKCT Environmental Specialist. Completion Date: 30 th September 2014
18	DCC	Driver Summary Sheet	Road Delivery Standards – Utilise truckwash at PKCT after tipping.	It is recommended that PKCT: - Update DCC at least annually to ensure the document accurately reflects current operations and requirements. -Specifically update the DCC to include changed truckwash operations as a result of the upgrade. - Update the CTO to include specific criteria regarding the new truckwash (e.g. stops on signals, travels through truckwash at no more than 5km/hr etc.)	Recommendation is accepted. In accordance with Schedule 4, Condition 7, the DCC will be reviewed and revised, including the Driver Summary sheet as appropriate. An action has been entered in the EMS and the record is "RR-0030". An annual review for DCC has been entered into the EMS and the record is "RR-00029". CTO recommendation is accepted and the action is complete (3 rd June 2014). PKCT CTO form updated to include reference to traffic signals and speed restrictions at new truckwash. Action by: PKCT Environmental Specialist

					Completion Date: 8 th August 2014.
19	DCC	Driver Summary Sheet	Road Delivery Standards – Have the load covered from the mine to PKCT road receival area	It is recommended that PKCT: - Pass on recommendations to Bulktrans to complete audit forms in a thorough manner, including all criteria relevant at the time of the audit.	This recommendation accepted. An action has been entered in EMS and the record is “COR-00145”. Action by: PKCT Environmental Specialist. Completion Date: 8 th August 2014.
20	DCC	Driver Summary Sheet	Road Delivery Standards – Operate the vehicle in a manner that minimises vehicle noise	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is accepted. Refer to Item No. 17 response and actions.
21	DCC	Driver Summary Sheet	Road Delivery Standards – All trucks are to pass through a truckwash at mine and at PKCT	It is recommended that PKCT: - Update DCC at least annually to ensure the document accurately reflects current operations and requirements. -Specifically update the DCC to include changed truckwash operations as a result of the upgrade. - Update the CTO to include specific criteria regarding the new truckwash (e.g. stops on signals, travels through truckwash at no more than 5km/hr etc.)	Recommendation is accepted. Refer to Item No. 18 response and actions.
22	DCC	Driver Summary Sheet	Road Delivery Standards – drivers must ensure tailgates are locked.	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criterion be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is accepted. Refer to Item No. 17 response and actions.

23	DCC	Driver Summary Sheet	Road Delivery Standards – No queuing is permitted on Springhill road	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is accepted. Refer to Item No. 17 response and actions.
24	DCC	Haulage Routes	All haulage trucks travelling to and from PKCT will do so by using major arterial roads as outlined in the PKCT Driver's Code of Conduct.	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is accepted. Refer to Item No. 17 response and actions.
25	DCC	Haulage Routes	Appin Road - Special care should be taken when crossing Loddon River bridge which is narrow.	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC	Recommendation is accepted. Refer to Item No. 17 response and actions.
26	DCC	Haulage Routes	Masters Rd - Compression braking on this route should be avoided due to community disturbance.	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation is accepted. Refer to Item No. 17 response and actions.

27	DCC	Haulage Routes	Springhill Rd - Compression brakes are not to be used on the approach to the lights at Springhill and Port Kembla Road.	It is recommended that PKCT: - Stipulate to relevant road transport operators that this criteria be adequately covered and specifically referenced in their audit forms. This will allow PKCT to better monitor compliance with this aspect of the PKCT DCC.	Recommendation accepted. Refer to Item No. 17 response and actions.
28	MCoA	Schedule 3, Condition 2	Noise	It is recommended that PKCT: - Update the Noise Management and Monitoring Plan to include discussion regarding the limitations posed by, and appropriateness of using the Barn Owl Noise Monitoring System. - Conduct further analysis of the measurement results to verify whether the limitations of the Barn Owl system do not adversely impact the findings of the report.	Recommendation is accepted. PKCT's noise consultant, Wilkinson Murray, will be engaged to address the matters raised. Action by: PKCT Risk Manager Completed by 31 st October 2014.
29	DCC	Driver Summary Sheet	Travel Time – Road haulage of coal is permitted to PKCT between 7am and 10pm Monday to Friday and 8am to 6pm on Saturday and Sunday	It is recommended that PKCT: - Review the Driver Summary Sheet to ensure that all obligations within the DCC are included and provided to Road Transport Companies and Transport Providers, in the form of an updated DCC. - Align the DCC obligations to the MCoA, in particular to truck dispatch times from NRE to PKCT.	Recommendation is accepted. Refer to Item No. 18 response and actions.
30	EPL	Schedule R1, Condition 5	Deadline for Annual Return-	It is recommended that PKCT: - Keep records of lodgement of Annual	Recommendation is accepted.

			<p>The Annual Return for the reporting period must be supplied to the EPA by registered post no later than 60 days after the end of the reporting period.</p>	<p>Returns for documentation and quality assurance purposes.</p>	<p>Action complete.</p> <p>PKCT has recently submitted the 2013/2014 Annual Return. Records of lodgement have been filed.</p>
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Item No.	Doc.	Condition	Topic	Requirement	PKCT Response
31	P&I Letter reference 12/08896-1 Dated: 25/09/2013	Schedule 2, Condition 6	Limits on Approval	<p>PKCT is approved to increase road transportation of coal and bulk products up to 10 mtpa subject to;</p> <p>The DCC or where more appropriate, the DCC Implementation Plan being updated to include;</p> <ul style="list-style-type: none"> - The Code related recommendations in the document Port Kembla Coal Terminal – Independent Environmental Audit Report (AECOM, 2011) and - Measures for encouraging and facilitating drivers to report poor road conditions that may increase noise impacts on sensitive receivers and traffic light timing and sequencing that causes unnecessary braking noise along haulage routes 	<p>Requirements are noted.</p> <p>PKCT will ensure that any outstanding recommendations related to the Code are included in the revision of the DCC and/or DCC Implementation Plan during the review process.</p> <p>Measures for encouraging and facilitating drivers to report poor road conditions that may increase noise impacts on sensitive receivers and traffic light timing and sequencing that causes unnecessary braking noise haulage routes will be investigated and included in the DCC and DCC Implementation Plan review.</p> <p>Action by: Environmental Specialist</p> <p>Completion Date: 8th August 2014.</p>
32	P&I Letter reference 12/08896-1 Dated: 25/09/2013	Schedule 2, Condition 6	Limits on Approval	<p>PKCT is approved to increase road transportation of coal and bulk products up to 10 mtpa subject to;</p> <ul style="list-style-type: none"> - A copy of the document 10 Mtpa Road Transport Monitoring Trial, NSW DP&I Submission Report – Condition 6 of “Major Project Approval 08_0009” (Revision 3, dated May 2013, Port Kembla Coal Terminal/Cardno) being placed on Port Kembla Coal Terminal Limited’s website 	<p>Requirement noted, action complete. Document has been placed on PKCT Website.</p>